

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: DA VINCI SURGICAL)
ROBOT ANTITRUST LITIGATION) Case No.:
-----) 3:21-cv-03825-VC
THIS DOCUMENT RELATES TO:)
ALL CASES) Pages 1 to 205
-----)
SURGICAL INSTRUMENT SERVICE)
COMPANY, INC.,)
)
Plaintiff,)
)
vs.)
)
INTUITIVE SURGICAL, INC.,)
)
Defendant.)
-----)

DEPOSITION OF:
CLIFTON EARL PARKER, VOLUME I
TUESDAY, OCTOBER 25, 2022
9:08 a.m. Eastern Daylight Time

REPORTED BY:
Vickie Blair
CSR No. 8940, RPR-CRR
JOB NO. 5541122

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1 Deposition of CLIFTON EARL PARKER, the witness, taken on
2 behalf of the Defendant, on Tuesday, October 25, 2022,
3 9:08 a.m. Eastern Daylight Time, before VICKIE BLAIR,
4 CSR No. 8940, RPR-CRR.

5
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19 ALSO PRESENT:

20 RAMON A. PERAZA, Videographer
21
22
23
24
25

1 customers; correct? 11:49:19

2 A Yes. 11:49:20

3 Q What types of contracts are those? 11:49:20

4 A All we have right now is verbal agreements 11:49:21

5 with Alliance Healthcare. 11:49:26

6 We do have a written statement of work, 11:49:27

7 SOWs with Marcus Engineering to do development work, so 11:49:34

8 those are signed agreements. 11:49:38

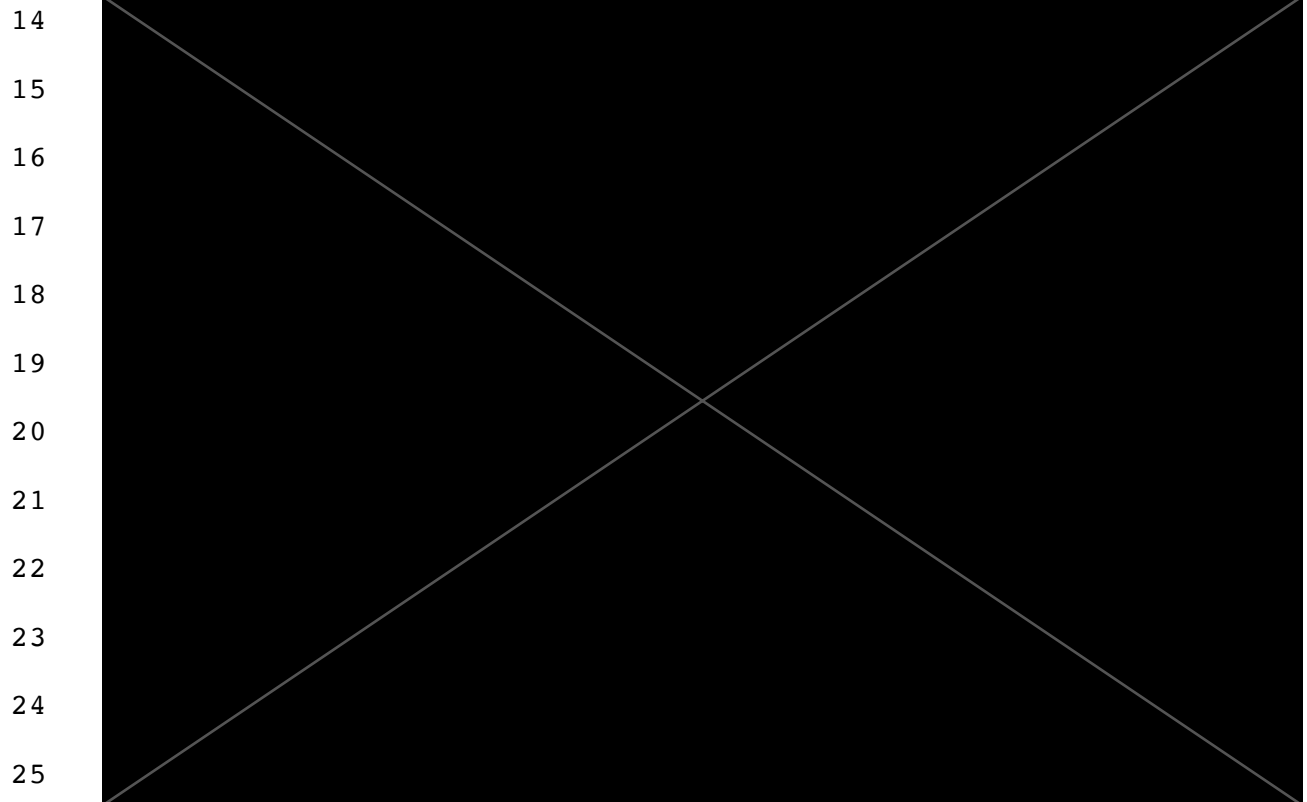
9 We -- we have a distribution agreement 11:49:41

10 with Medline that covers both the Si and Xi sales and 11:49:49

11 distribution. 11:49:55

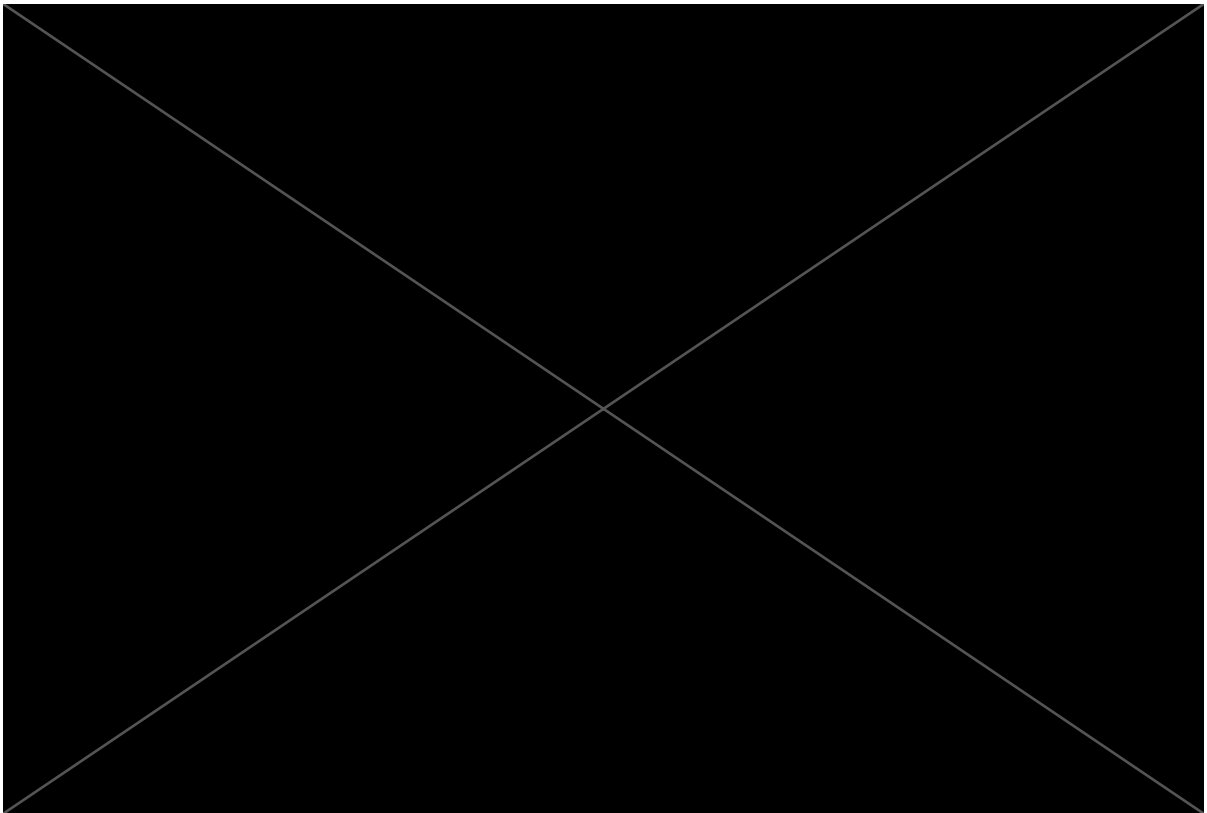
12 Q Uh-huh. 11:49:59

13 A That's currently in place right now. 11:50:01



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13 Q When did Restore first consider repairing 11:51:30
14 Xi and X compatible EndoWrists, roughly? 11:51:33
15 A We were first contacted by Rebotix, or 11:51:38
16 Kevin and Rebotix met, and I believe it was -- it was 11:51:44
17 April of 2018, and then sometime between April 2018 and 11:51:48
18 October '18, we had the discussions with Rebotix to be 11:51:53
19 their repair center. 11:52:01
20 So we were doing -- we started doing the 11:52:02
21 repairs for their customers, our customers, and any 11:52:04
22 other distributors starting in October of 2018. 11:52:09
23 And then December of 2019, I think, is 11:52:14
24 when we undertook our development efforts to develop 11:52:21
25 our technology. I think we got our first chips, our 11:52:25